

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE EASTERN DISTRICT OF OKLAHOMA**

GREAT LAKES INSURANCE SE,

Plaintiff,

VS.

WAGNER & LYNCH, PLLC,

Defendant.

Case No. 6:23-CV-00052-JAR

**PLAINTIFF GREAT LAKES INSURANCE SE'S
FINAL WITNESS LIST**

Pursuant to the Court's Scheduling Order dated March 21, 2023 (Dkt. # 15), Plaintiff Great Lakes Insurance SE respectfully submits this Final Witness List. Defendant Great Lakes Insurance SE hereby identifies the following witnesses who will be called and those who may be called at trial. Defendant will supplement, modify, or augment these submissions as necessary, due to any permissible changes by Plaintiff, additional discovery, and/or as otherwise provided by applicable rules or Court order.

	Individual	Subject of Testimony	Expected/May be Called
1.	Blake Lynch c/o Foundation Law, P.L.L.C. P.O. Box 758 McAlester, OK 74502 Phone: 918-839-6353	Facts, circumstances, and documents relating to the subjects of this litigation, including, but not limited to, facts alleged in Plaintiff's Petition, facts alleged in Defendant's Counterclaim, Defendant's loss claims under the Policy, and Defendant's communications and knowledge.	Will be called.
2.	Randy Howard c/o Doerner, Saunders, Daniel & Anderson 2 West 2 nd St, Suite 700 Tulsa, OK 74103 Phone: 918-591-5271	Facts, circumstances, and documents relating to the subjects of this litigation, including, but not limited to, facts alleged in Plaintiff's Petition, facts alleged in Defendant's Counterclaim, Defendant's loss claims under the Policy and subsequent claims investigation, claims handling, and determinations related thereto.	Will be called.

	Individual	Subject of Testimony	Expected/May be Called
3.	Amanda Littlejohn c/o Foundation Law, P.L.L.C. P.O. Box 758 McAlester, OK 74502 Phone: 918-839-6353	Facts, circumstances, and documents relating to the subjects of this litigation, including, but not limited to, facts alleged in Plaintiff's Petition, facts alleged in Defendant's Counterclaim, Defendant's loss claims under the Policy, and Defendant's communications and knowledge.	May be called.
4.	Keith Heaslet Superior Plumbing 1474 Blackberry Road Indianola, OK 74442 Phone: 918-916-2877	Facts, circumstances, and documents relating to the subjects of this litigation, including, but not limited to, the source of the loss, the cause of the loss, how the loss was fixed, communications with the parties, and various relevant plumbing knowledge.	Will be called.
5.	Representative of Flood Serv 201 W Cherokee Ave. McAlester, OK 74501 Phone: 918-268-7650	Facts, circumstances, and documents relating to the subjects of this litigation, including, but not limited to remediation of the loss, documentation of the damage, and extent of damage.	May be called.
6.	Todd Nave Baytown Construction P.O. Box 375 Crowder, OK 74430 Phone: 918-429-6160	Facts, circumstances, and documents relating to the subjects of this litigation, including, but not limited to, facts alleged in Plaintiff's Petition, facts alleged in Defendant's Counterclaim, communications with Defendant, communications with subcontractors, and work performed.	May be called.
7.	Adrian Nyunt c/o Doerner, Saunders, Daniel & Anderson 2 West 2 nd St, Suite 700 Tulsa, OK 74103 Phone: 918-591-5271	Facts, circumstances, and documents relating to the subjects of this litigation, including, but not limited to, facts alleged in Plaintiff's Petition, facts alleged in Defendant's Counterclaim, Defendant's loss claims under the Policy and subsequent claims investigation, claims handling, and determinations related thereto.	May be called.
8.	John Thill c/o Doerner, Saunders, Daniel & Anderson 2 West 2 nd St, Suite 700 Tulsa, OK 74103 Phone: 918-591-5271	Facts, circumstances, and documents relating to the subjects of this litigation, including, but not limited to, facts alleged in Plaintiff's Petition, facts alleged in Defendant's Counterclaim, Defendant's loss claims under the Policy and subsequent claims investigation, claims handling, and determinations related thereto.	May be called.

	Individual	Subject of Testimony	Expected/May be Called
9.	Subject to objection, all witnesses identified through subsequent discovery or further in the course of litigation.		
10.	Subject to objection, all witnesses necessary for the identification and authentication of documents.		
11.	Subject to objection, all rebuttal witnesses.		
12.	Subject to objection, all impeachment witnesses.		
13.	Subject to objection, all witnesses including experts, listed by Defendant.		

DOERNER, SAUNDERS, DANIEL
& ANDERSON, L.L.P.

By: s/ Alexandra J. Gage
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Attorneys for Plaintiff Great Lakes Insurance SE

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of August, 2023, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Wes.foundationlaw@gmail.com

s/ Alexandra J. Gage